

1 **PAUL K. CHARLTON**  
United States Attorney  
2 District of Arizona  
**IRENE C. FELDMAN**  
3 Assistant U.S. Attorney  
Unites States Courthouse  
4 405 W. Congress St., Suite 4800  
Tucson, Arizona 85701  
5 Telephone: (520) 620-7300  
E-mail: irene.feldman@usdoj.gov  
6 Attorneys for Plaintiff

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF ARIZONA**

**CR06-1290TUC**  
**INDICTMENT**

9 **United States of America,**

10 **Plaintiff,**

11 **v.**

12 [1] **Carlos Gonzalez-Rodriguez,**  
13 [2] **Carlos Alberto Sanchez-Maldonado,**  
[3] **Juan Carlos Leon-Ruiz,**  
14 [4] **Jose Alfredo Loza-Beltran,**  
[5] **Gerardo Arreola-Tellechea,**  
15 [6] **Manuel Lopez-Verdugo, and**  
[7] **Alejandro Garcia-Garcia,**

16 **Defendants.**

**Violations:**

8 U.S.C. § 1324(a)(1)(A)(v)(I)  
8 U.S.C. § 1324(a)(1)(A)(ii)  
8 U.S.C. § 1324(a)(1)(A)(iii)  
8 U.S.C. § 1324(a)(1)(B)(i)

**(Conspiracy to Transport and  
Harbor Illegal Aliens for Profit;  
Transportation of Illegal  
Aliens for Profit; Harboring  
Illegal Aliens for Profit)**

17  
18 **THE GRAND JURY CHARGES:**

19 **COUNT ONE**

20 **(Conspiracy to Transport and Harbor Illegal Aliens for Profit)**

21 From on or about May 23, 2006, to on or about May 30, 2006, at or near Rio Rico, in  
22 the District of Arizona, [1] Carlos Gonzalez-Rodriguez, [2] Carlos Alberto Sanchez-  
23 Maldonado, [3] Juan Carlos Leon-Ruiz, [4] Jose Alfredo Loza-Beltran, [5] Gerardo Arreola-  
24 Tellechea, [6] Manuel Lopez-Verdugo, and [7] Alejandro Garcia-Garcia, did knowingly and  
25 intentionally combine, conspire, confederate, and agree together and with various other  
26 persons known and unknown to the Grand Jury, to transport and move illegal aliens, in

3  
4 violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), and to conceal, harbor, and  
5 shield from detection illegal aliens, in violation of Title 8, United States Code, Section  
6 1324(a)(1)(A)(iii), and did so for the purpose of commercial advantage or private financial  
7 gain, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii),  
8 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

9 OBJECT OF THE CONSPIRACY

10 It was the object of the conspiracy that all or some of the co-conspirators, knowing and  
11 in reckless disregard of the fact that said aliens, Angelica Flores-Perez, Nicolas Daniel  
12 Ventura-Ayala, Juan Carlos Xinaxtle-Garache, Jesus Arellano-Islas, Elga Villegas-Sanchez,  
13 Rutilio Ramirez-Tristan, Victor Ramirez-Ramirez, and Abraham Perez-Ortiz, had come to,  
14 entered, and remained in the United States in violation of law, did knowingly transport, and  
15 move such aliens within the United States by means of transportation or otherwise, in  
16 furtherance of such violation of law.

17 It was further the object of the conspiracy that all or some of the co-conspirators would  
18 transport their passengers while they were all unrestrained, and unprotected, which was  
19 reckless.

20 It was further the object of the conspiracy that all or some of the co-conspirators knew  
21 that their passengers were illegal aliens and intended to assist them in remaining in the United  
22 States unlawfully.

23 It was further the object of the conspiracy that all or some of the co-conspirators,  
24 knowing and in reckless disregard of the fact that said aliens had come to, entered, and  
25 remained in the United States in violation of law, did knowingly conceal, harbor, and shield  
26 from detection such aliens in any place, including any building or any means of transportation.

1 United States v. Carlos Gonzalez-Rodriguez, et al.  
2 Indictment Page 3 of 10

3  
4 It was further the object of the conspiracy that all or some of the co-conspirators were  
5 to receive benefits by assisting the illegal aliens in remaining in the United States, or were to  
6 receive payment, such as compensation, or private financial gain, for their role in the  
7 transportation and harboring of said aliens.

8 It was further the object of the conspiracy that all or some of the co-conspirators served  
9 as "caretakers" at 1392 Calle Tepic, in Rio Rico, Arizona; a residence that was overcrowded,  
10 unsafe, and unsanitary. Such caretakers were in charge of guarding illegal aliens in the "stash  
11 house" where they would wait to be transported into the interior of the United States, and it  
12 was their role to maintain peace and quiet so as not to attract attention to the location to avoid  
13 detection and apprehension by law enforcement.

14 It was the further object of the conspiracy that all or some of the co-conspirators in  
15 furtherance of the conspiracy, committed the following overt acts, among others, in the District  
16 of Arizona, and elsewhere:

17 **OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY**

18 In furtherance of the conspiracy and to effect the object of the conspiracy, and to effect  
19 and accomplish the objects of the same, one or more of the conspirators committed, among  
20 others, the following overt acts, in the District of Arizona:

21 (a) On May 30, 2006, defendant [1] Carlos Gonzalez-Rodriguez drove a 2006 Silver  
22 Ford F-150 pickup truck from the residence located at 1392 Calle Tepic, in Rio Rico, Arizona,  
23 to a (Safeway) supermarket parking lot, in Nogales, Arizona. Rodriguez picked up ten (10)  
24 passengers who were loaded into the bed of the pickup truck. The ten (10) passengers were  
25 Mexican citizens illegally present in the United States, including Angelica Flores-Perez and  
26 Nicolas David Ventura-Ayala.

1 **United States v. Carlos Gonzalez-Rodriguez, et al.**  
2 **Indictment Page 4 of 10**

3  
4 (b) On May 30, 2006, defendant [6] Manuel Lopez-Verdugo drove a 2006 Green  
5 Ford Escape, from the residence located at 1392 Calle Tepic, in Rio Rico, Arizona, to a  
6 location off of Interstate 19. Agents approached the vehicle and observed several subjects  
7 lying down in the rear of the vehicle. All seven (7) passengers were Mexican citizens illegally  
8 present in the United States, including Elga Villegas-Sanchez and Rutilio Ramirez-Tristan.

9 (c) On May 30, 2006, defendant [7] Alejandro Garcia-Garcia drove a 2006 Red  
10 Mitsubishi Outlander from the residence located at 1392 Calle Tepic, in Rio Rico, Arizona,  
11 to a location off of Interstate 19. Agents approached the vehicle and observed several subjects  
12 lying face down and attempting to hide underneath a tarp in the rear cargo area, and four (4)  
13 subjects face down in the rear passenger area. All seven (7) passengers were Mexican citizens  
14 illegally present in the United States, including Victor Ramirez-Ramirez.

15 (d) On May 30, 2006, defendant [5] Gerardo Arreola-Tellechea drove a 2006 Silver  
16 Nissan Xterra from the residence located at 1392 Calle Tepic, in Rio Rico, Arizona, to a  
17 location off of Interstate 19. Agents approached the vehicle and observed several subjects  
18 lying down in the rear passenger area of the vehicle. The driver, defendant [5] Gerardo  
19 Arreola-Tellechea, accelerated the vehicle in an attempt to flee, and agents had to jump out  
20 of the way to avoid being struck by the vehicle. Agents followed the Nissan Xterra and  
21 located it just as defendant Arreola-Tellechea and several passengers were bailing out and  
22 running into a construction area. After a brief foot chase, agents apprehended defendant  
23 Arreola-Tellechea and six (6) of the passengers. All six (6) of the passengers were identified  
24 as Mexican citizens illegally present in the United States, including Juan Carlos Xinaxtle-  
25 Garache and Jesus Arellano-Islas.

26 (e) On May 30, 2006, agents went to the residence located at 1392 Calle Tepic, in

3  
4 Rio Rico, Arizona, and knocked on the door. Defendant [3] Juan Carlos Leon-Ruiz answered  
5 the door, and agents subsequently discovered seventy-three (73) illegal aliens inside the house,  
6 including material witness Abraham Perez-Ortiz. Material witnesses Carlos Xinaxtle-Garache,  
7 Jesus Arellano-Islas, Elga Villegas-Sanchez, Rutilio Ramirez-Tristan, and Victor Ramirez-  
8 Ramirez, although found in vehicles, had previously been kept at the “stash house.” All of the  
9 material witnesses illegally entered the United States at a place other than a port-of-entry, and  
10 were paying various fees to be smuggled into the United States. Defendants [2] Carlos  
11 Alberto Sanchez-Maldonado, [3] Juan Carlos Leon-Ruiz, and [4] Jose Alfredo Loza-Beltran,  
12 were “caretakers” guarding the aliens in the “stash house.”

13 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

14 COUNTS TWO through THIRTEEN herein, are re-alleged and incorporated in full as  
15 overt acts in furtherance of this conspiracy.

16 **COUNT TWO**  
17 **(Transportation of Illegal Aliens for Profit)**

18 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the defendant  
19 herein, [1] Carlos Gonzalez-Rodriguez, knowing and in reckless disregard of the fact that an  
20 alien, Angelica Flores-Perez, had come to, entered and remained in the United States in  
21 violation of law, did transport and move said alien within the United States by means of  
22 transportation or otherwise, in furtherance of such violation of law, and did so for the purpose  
23 of commercial advantage and private financial gain, in violation of Title 8, United States Code,  
24 Sections 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

3  
4 **COUNT THREE**  
5 **(Transportation of Illegal Aliens for Profit)**

6 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the defendant  
7 herein, [1] Carlos Gonzalez-Rodriguez, knowing and in reckless disregard of the fact that an  
8 alien, Nicolas Daniel Ventura-Ayala, had come to, entered and remained in the United States  
9 in violation of law, did transport and move said alien within the United States by means of  
10 transportation or otherwise, in furtherance of such violation of law, and did so for the purpose  
11 of commercial advantage and private financial gain, in violation of Title 8, United States Code,  
12 Sections 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

13 **COUNT FOUR**  
14 **(Transportation of Illegal Aliens for Profit)**

15 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the defendant  
16 herein, [5] Gerardo Arreola-Tellechea, knowing and in reckless disregard of the fact that an  
17 alien, Juan Carlos Xinaxtle-Garache, had come to, entered and remained in the United States  
18 in violation of law, did transport and move said alien within the United States by means of  
19 transportation or otherwise, in furtherance of such violation of law, and did so for the purpose  
20 of commercial advantage and private financial gain, in violation of Title 8, United States Code,  
21 Sections 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

22 **COUNT FIVE**  
23 **(Transportation of Illegal Aliens for Profit)**

24 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the defendant  
25 herein, [5] Gerardo Arreola-Tellechea, knowing and in reckless disregard of the fact that an  
26 alien, Jesus Arellano-Islas, had come to, entered and remained in the United States in violation  
of law, did transport and move said alien within the United States by means of transportation

3  
4 or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial  
5 advantage and private financial gain, in violation of Title 8, United States Code, Sections  
6 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

7  
8 **COUNT SIX**  
**(Transportation of Illegal Aliens for Profit)**

9 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the defendant  
10 herein, [6] Manuel Lopez-Verdugo, knowing and in reckless disregard of the fact that an alien,  
11 Elga Villegas-Sanchez, had come to, entered and remained in the United States in violation  
12 of law, did transport and move said alien within the United States by means of transportation  
13 or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial  
14 advantage and private financial gain, in violation of Title 8, United States Code, Sections  
15 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

16  
17 **COUNT SEVEN**  
**(Transportation of Illegal Aliens for Profit)**

18 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the defendant  
19 herein, [6] Manuel Lopez-Verdugo, knowing and in reckless disregard of the fact that an alien,  
20 Rutilio Ramirez-Tristan, had come to, entered and remained in the United States in violation  
21 of law, did transport and move said alien within the United States by means of transportation  
22 or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial  
23 advantage and private financial gain, in violation of Title 8, United States Code, Sections  
24 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

3  
4 **COUNT EIGHT**  
5 **(Transportation of Illegal Aliens for Profit)**

6 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the defendant  
7 herein, [7] Alejandro Garcia-Garcia, knowing and in reckless disregard of the fact that an  
8 alien, Victor Ramirez-Ramirez, had come to, entered and remained in the United States in  
9 violation of law, did transport and move said alien within the United States by means of  
10 transportation or otherwise, in furtherance of such violation of law, and did so for the purpose  
11 of commercial advantage and private financial gain, in violation of Title 8, United States Code,  
12 Sections 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

13 **COUNT NINE**  
14 **(Harboring Illegal Aliens for Profit)**

15 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the  
16 defendants herein, [2] Carlos Alberto Sanchez-Maldonado, [3] Juan Carlos Leon-Ruiz, and  
17 [4] Jose Alfredo Loza-Beltran, knowing and in reckless disregard of the fact that an alien, Juan  
18 Carlos Xinaxtle-Garache, had come to, entered, and remained in the United States in violation  
19 of law, did knowingly conceal, harbor, and shield from detection, such alien in any place,  
20 including any building or any means of transportation, and did so for the purpose of  
21 commercial advantage and private financial gain, in violation of Title 8, United States Code,  
22 Sections 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

23 **COUNT TEN**  
24 **(Harboring Illegal Aliens for Profit)**

25 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the  
26 defendants herein, [2] Carlos Alberto Sanchez-Maldonado, [3] Juan Carlos Leon-Ruiz, and

1 United States v. Carlos Gonzalez-Rodriguez, et al.  
2 Indictment Page 9 of 10

3  
4 [4] Jose Alfredo Loza-Beltran, knowing and in reckless disregard of the fact that an alien,  
5 Jesus Arellano-Islas, had come to, entered, and remained in the United States in violation of  
6 law, did knowingly conceal, harbor, and shield from detection, such alien in any place,  
7 including any building or any means of transportation, and did so for the purpose of  
8 commercial advantage and private financial gain, in violation of Title 8, United States Code,  
9 Sections 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

10 **COUNT ELEVEN**  
11 **(Harboring Illegal Aliens for Profit)**

12 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the defendant  
13 herein, [2] Carlos Alberto Sanchez-Maldonado, [3] Juan Carlos Leon-Ruiz, and [4] Jose  
14 Alfredo Loza-Beltran, knowing and in reckless disregard of the fact that an alien, Elga  
15 Villegas-Sanchez, had come to, entered, and remained in the United States in violation of law,  
16 did knowingly conceal, harbor, and shield from detection, such alien in any place, including  
17 any building or any means of transportation, and did so for the purpose of commercial  
18 advantage and private financial gain, in violation of Title 8, United States Code, Sections  
19 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

20 **COUNT TWELVE**  
21 **(Harboring Illegal Aliens for Profit)**


22 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the  
23 defendants herein, [2] Carlos Alberto Sanchez-Maldonado, [3] Juan Carlos Leon-Ruiz, and  
24 [4] Jose Alfredo Loza-Beltran, knowing and in reckless disregard of the fact that an alien,  
25 Rutilio Ramirez-Tristan, had come to, entered, and remained in the United States in violation  
26 of law, did knowingly conceal, harbor, and shield from detection, such alien in any place,

3  
4 including any building or any means of transportation, and did so for the purpose of  
5 commercial advantage and private financial gain, in violation of Title 8, United States Code,  
6 Sections 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).


7 **COUNT THIRTEEN**  
8 **(Harboring Illegal Aliens for Profit)**

9 On or about May 30, 2006, at or near Rio Rico, in the District of Arizona, the  
10 defendants herein, [2] Carlos Alberto Sanchez-Maldonado, [3] Juan Carlos Leon-Ruiz, and  
11 [4] Jose Alfredo Loza-Beltran, knowing and in reckless disregard of the fact that an alien,  
12 Victor Ramirez-Ramirez, had come to, entered, and remained in the United States in violation  
13 of law, did knowingly conceal, harbor, and shield from detection, such alien in any place,  
14 including any building or any means of transportation, and did so for the purpose of  
15 commercial advantage and private financial gain, in violation of Title 8, United States Code,  
16 Sections 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

17  
18 A TRUE BILL

19   
20 Presiding Judge

21 PAUL K. CHARLTON  
22 United States Attorney  
23 District of Arizona

24   
25 Assistant United States Attorney

26  
REDACTED FOR  
PUBLIC DISCLOSURE  
JUL 28 2008